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7 LIBERTY MUTUAL FIRE INSURANCE COMPANY

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 SHARRON ELISE SALINAS, individually )  
11 Plaintiff, ) CASE NO.: 2:14-cv-01494-GMN-PAL  
12 vs. )  
13 LIBERTY MUTUAL FIRE INSURANCE )  
COMPANY, a Massachusetts company; )  
14 DOES I - X, inclusive; and/or ROE )  
CORPORATIONS I - X, inclusive, )  
15 Defendants. )  
16 )  
17 )  
18 **IT IS HEREBY STIPULATED BY AND BETWEEN**, Defendant, LIBERTY  
19 MUTUAL FIRE INSURANCE COMPANY, [hereinafter referred to as "Defendant"], by and  
20 through its counsel of record, the law firm of KOELLER, NEBEKER, CARLSON &  
HALUCK, LLP, and Plaintiff, SHARRON ELISE SALINAS [hereinafter referred to as  
21 "Plaintiff"], by through her counsel of record, Justin G. Randall, Esq., of the law firm of  
22 GLEN LERNER INJURY ATTORNEYS, that:  
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24 1. For any and all litigation regarding the claims at issue in this case, Plaintiff,  
SHARRON ELISE SALINAS, will not seek and cannot receive damages in excess  
25 of \$50,000.00, if any, inclusive of all prejudgment interest, costs, and fees,  
26 including but not limited to, attorneys' fees.

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1           2. Based on the limitation of Plaintiff's alleged damages and Plaintiff's counsel's  
2 representations, the parties agree to remand this case to the Eighth Judicial District  
3 Court, as the case in controversy amount is not met.  
4           3. The parties agree to, and waive any and all claims to attorneys' fees and costs  
5 solely related to the Removal and/or Remand of this case.

6 DATED this 20<sup>th</sup> day of October, 2014.

DATED this 20<sup>th</sup> day of October, 2014.

7 KOELLER NEBEKER CARLSON  
8 & HALUCK, LLP

GLEN LERNER INJURY ATTORNEYS

9 By: David M. Gould

10 DAVID M. GOULD, ESQ.  
Nevada Bar No. 11143  
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12 Attorneys for Defendant,  
LIBERTY MUTUAL FIRE  
13 INSURANCE COMPANY

By: Justin G. Randall

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## ORDER

**IT IS HEREBY ORDERED** that for any and all litigation regarding the claims at issue in this case, Plaintiff, SHARRON ELISE SALINAS, will not, may not and shall not seek, and cannot receive, damages in excess of \$50,000.00, if any, inclusive of any and all prejudgment interest, costs, and fees, including but not limited to, attorneys' fees.

**IT IS HEREBY FURTHER ORDERED** that, based on the limitation of Plaintiff's alleged damages and Plaintiff's counsel's representations, this matter is remanded to the Eighth Judicial District Court, as the case in controversy amount is not met.

**IT IS HEREBY FURTHER ORDERED** that the parties waive any and all claims to attorneys' fees and costs solely related to the Removal and/or Remand of this case.

**DATED** this 20th day of October, 2014.

Gloria M. Navarro, Chief Judge  
United States District Court

Respectfully Submitted By:

KOELLER, NEBEKER, CARLSON  
& HALUCK, LLP

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